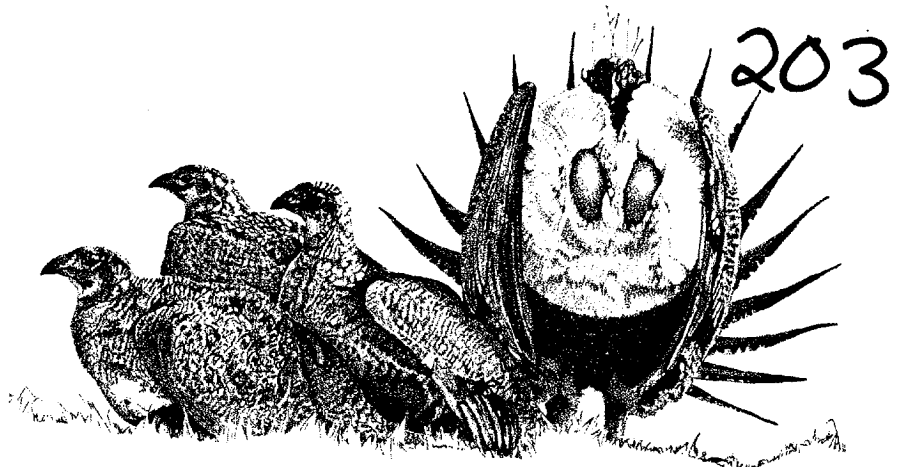


IDAHO AUDUBON COUNCIL



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May 18, 2000

The following comments concern the proposed Unified Federal Policy for Ensuring a Watershed Approach to Federal Land and Resource Management.

A. We are concerned with the term "management activities" that is part of the 3rd goal listed on page 1 of the section titled Frequently Asked Questions. The full sentence reads "Use the results of watershed assessments to guide planning and management activities."

There are far too many instances on the Idaho Panhandle National Forests where the Forest Service promotes new timber sales in damaged watersheds, with the claim that receipts from the timber sales will help pay for watershed restoration. The reasons why the watersheds and fisheries are damaged is due to previous Forest Service logging and road building. Restoring watersheds on the National Forests will not be accomplished with more timber sales and road construction or road reconstruction in the damaged watersheds and drainages. A proposed policy that calls for more logging in damaged watersheds and drainages on National Forest lands is unacceptable.

B. Page 1, Goal #5. This Goal concerns the Clean Water Act (CWA). The requirements of the CWA for the protection and propagation of fish should be part of the proposed policy, especially for those species which are listed as threatened or endangered under the ESA.

C. Page 2, Restoring Watersheds. The proposed policy should emphasize that the Federal Agencies need to have dedicated funds that are to be used for restoration work only, and that are not dependent upon timber sales.

D. Page 2, Waters of exceptional value. Concerning the National Forests, these waters should include those watersheds where there

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